

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: JUN 17 2014 June 16, 2014	WILMERHALE USDC SDNY DOCUMENT ELECTRONICALLY FILED ED: Cosmin Maier +1 212 230 8816 (t) +1 212 230 8888 (f) cosmin.maier@wilmerhale.com
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BY ECF and HAND DELIVERY

Hon. Laura Taylor Swain
 United States District Judge
 United States District Court
 Southern District of New York
 Daniel P. Moynihan United States Courthouse
 500 Pearl Street
 New York, NY 10007-1312

MEMO ENDORSED

Re: Amplify Education, Inc. v. Greenwood Publishing Group, Inc. d/b/a Heinemann, Civil No. 1:13-cv-02687-LTS-RLE

Dear Judge Swain:

On behalf of both Amplify Education, Inc. ("Amplify") and Greenwood Publishing Group, Inc. d/b/a Heinemann ("Heinemann"), I write to jointly request an additional 15 pages for the opening and responsive claim construction briefs with respect to U.S. Patent No. 6,299,452, and an additional six pages for the reply brief. This would result in 40 pages for the opening and responsive claim construction briefs, and 16 pages for the reply brief. *See, e.g., Princeton Digital Image Corp. v. Hewlett-Packard, Co. et al.*, 12-cv-779, Aug. 16, 2013 Order [Dkt. 321] (S.D.N.Y.) (allowing 45 pages for opening claim construction brief).

The parties submitted their Joint Claim Terms Chart on June 5, 2014 [Dkt. 41]. The parties seek construction of 28 means-plus-function terms and 12 non-means-plus-function terms.

While the parties have attempted to group terms in order to address them together, the current page limits are insufficient to properly address all of the disputed terms of the '452 patent. The Court would benefit from additional briefing to allow the parties to set forth their arguments with respect to all of these terms.

The request is granted.

Respectfully submitted,

/s/ Cosmin Maier

Cosmin Maier

SO ORDERED:

[Signature] 6/17/14
HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE

WILMERHALE

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June 16, 2014
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cc: All Counsel of Record via ECF